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ROBINSON MCFADDEN  
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

February 22, 2005

**HAND DELIVERED**

Mr. Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Synergy Business Park, Saluda Building  
101 Executive Center Drive  
Columbia, SC 29210

**Bonnie D. Shealy**  
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**Re: BellSouth Transit Traffic Service Tariff filed 2/2/05**  
**Our File No. 19336-0014**

*Tariff 2005 50*  
*Docket - 2005-63 C*

Dear Mr. Terreni:

Enclosed for filing on behalf of the South Carolina Cable Television Association please find a Complaint and Petition to Intervene in the above referenced BellSouth's Transit Traffic Service Tariff Filing No. SC2004-138 filed February 2, 2005. By copy of this letter we are serving the same on other counsel who have petitioned the Commission on this matter. Please stamp the extra copies provided as proof of filing and return them with our courier. Should you need any additional information, please contact me.

RECEIVED  
2005 FEB 22 PM 2:02  
SC PUBLIC SERVICE  
COMMISSION

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

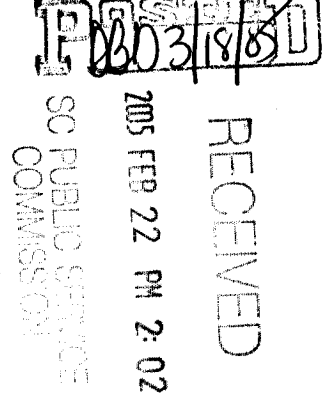
*Bonnie D. Shealy*  
Bonnie D. Shealy

/bds

Enclosures

cc/enc:

Ms. Nancy Horne  
Dan F. Arnett, ORS Chief of Staff  
Patrick Turner, Esquire  
M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
John J. Pringle, Jr., Esquire  
Florence Belser, ORS General Counsel  
Ms. Daphne Werts (via email)



STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

IN RE:

BellSouth Telecommunications, Inc.  
Transit Traffic Service Tariff No. SC2004-138  
filed February 2, 2005

**COMPLAINT AND  
PETITION TO INTERVENE**

The South Carolina Cable Television Association ("SCCTA") hereby complains and petitions the Public Service Commission of South Carolina ("Commission"), pursuant to 26 S.C. Regs. 103-835 and 103-836 and other applicable rules and regulations of the Commission for permission to participate in any proceeding established to address the Transit Traffic Service Tariff filing of BellSouth Telecommunications, Inc. ("BellSouth"). In support of this Petition, SCCTA would show the following:

1. SCCTA is a nonprofit corporation, organized and existing pursuant to the laws of the State of South Carolina, representing over one hundred franchised cable television systems operating within South Carolina.

2. SCCTA's authorized representatives in this proceeding are as follows:

SCCTA OFFICIAL

Ms. Nancy Horne  
South Carolina Cable Television Association  
6175 Barfield Road, Suite 200  
Atlanta, Georgia 30328

and

## LEGAL REPRESENTATIVES

Frank R. Ellerbe, III, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1500  
Post Office Box 944  
Columbia, South Carolina 29202  
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3. BellSouth filed a new proposed tariff offering that establishes the rates, terms and conditions for BellSouth's Transit Traffic Service in the General Subscriber Service Tariff. According to the tariff filing, BellSouth provides transit traffic service when the call is originated and terminated by a service provider other than BellSouth and BellSouth transports the call between the originating and terminating carriers.

4. SCCTA has an interest in the above-captioned proceeding inasmuch as SCCTA's members are potential providers and providers of competitive local exchange services in South Carolina who must use BellSouth's transit services to interconnect with other local carriers. SCCTA hereby requests permission to intervene in the above-captioned proceeding as a formal party of record.

5. SCCTA's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding. SCCTA's position in this docket is that the Commission should adopt reasonable and non-discriminatory policies for the provision of transit traffic services, interconnection, and related services which are structured to allow CLECs to compete effectively in the market for local services.

6. SCCTA is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent

with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing the views and concerns of SCCTA can be developed.

WHEREFORE, SCCTA prays for the following relief:

A. That this Petition to Intervene be granted by the Commission and that SCCTA be made a formal party of record to the proceeding.

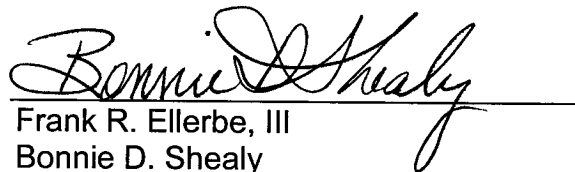
B. That SCCTA be allowed to participate fully in this proceeding and to take such positions as it deems advisable.

C. That such other and further relief be granted as is just and proper.

Dated this 22<sup>nd</sup> day of February, 2005.

ROBINSON, McFADDEN & MOORE, P.C.

By



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Attorneys for South Carolina Cable Television  
Association

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

In Re:

BellSouth Telecommunications,  
Inc. Transit Traffic Service Tariff  
No. SC2004-138 filed February 2,  
2005

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**CERTIFICATE OF SERVICE**

This is to certify that I, Mary F. Cutler, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the persons named below the **Complaint and Petition to Intervene** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, PA  
Post Office Box 2285  
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Post Office Box 11263  
Columbia, SC 29211

Dan F. Arnett, Cheif of Staff  
Office of Regulatory Staff  
1441 Main Street, 3rd Floor  
Columbia, SC 29201

Dated at Columbia, South Carolina this 22<sup>nd</sup> day of February 2005.

  
Mary F. Cutler